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July 15, 1994

Mr. Robert Krivinskas  
Northern Division NAVFACENGCOM  
10 Industrial Highway  
Mail Stop #82  
Lester, PA 19113-2090

Re: Draft Final Proposed Plan  
Site 05 - Transformer Oil Disposal Area  
Site 08 - DPDO Film Processing Disposal Area  
Naval Construction Battalion Center  
Davisville, Rhode Island  
Contract No. N62472-86-C-1282  
TRC Project No. 01042-0070-00010

Dear Mr. Krivinskas:

Enclosed please find four (4) copies of the Draft Final Proposed Plan which has been prepared for the following sites at the Naval Construction Battalion Center in Davisville, Rhode Island:

- Site 05 - Transformer Oil Disposal Area
- Site 08 - DPDO Film Processing Disposal Area

Also attached is a summary of EPA comments on the Draft Proposed Plan and responses to those comments. The Rhode Island Department of Environmental Management submitted a comment letter dated June 23, 1994 which did not provide specific comments on the document but rather noted a desire to review the evaluation of the nine criteria and presented a general concern with respect to the presence of manganese in ground water at Site 08. It is anticipated that this general concern will be addressed through the implementation of site use restrictions (i.e., a limited action rather than no action) at Site 08, as described in this Draft Final Proposed Plan.

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Please note that discussions of potential risk associated with ground water ingestion at Site 08 have been revised to reflect the commercial/industrial site use scenario, as presented in Appendix I of Volume I - DPDO Film Processing Disposal Area Remedial Investigation Report, May 1994.

We look forward to receiving your comments on this document. Should you have any questions regarding this submittal, please do not hesitate to contact us.

Sincerely,

TRC ENVIRONMENTAL CORPORATION



Robert C. Smith, P.E.  
Program Manager

rcs/ljh

cc: L. Fayan, NCBC-Davisville (2 copies)  
C. Williams, USEPA - Region I (2 copies)  
J. Graham, RIDEM (2 copies)  
S. Gnewuch, ADL (2 copies)

**TRC**

**NAVY RESPONSES TO USEPA - REGION I COMMENTS  
DRAFT PROPOSED PLAN  
U.S. NAVY - NCBC DAVISVILLE, RHODE ISLAND  
SITES 05 AND 08**

**Specific Comments**

Comment No.

Page 1, Section 1

1. The "No Action" should be changed to "Limited Action" because of the site restrictions that would be placed on the future site use according to this section. However, on page 10 the Navy states that the risk exposure is within acceptable risk range. Why would you need restrictions?

Response: *In accordance with further discussions with EPA, the Proposed Plan has been revised to reflect limited action at both Sites 05 and 08.*

Page 3, Section 2.2

2. Add a sentence explaining where these reports are available to the public.

Response: *The following sentence has been added: "These reports are available for public review at the Information Repository as listed on Page 5."*

3. Add the date of the public hearing and put the address on the same page instead of the top of the next page so this paragraph is easier to read.

Response: *The date of the public hearing (August 16, 1994) has been inserted. The text has been reformatted, as requested, so that the address directly follows the referenced text.*

4. The Navy mentions that, during the public comment period, the public can review the proposed plan, the RI reports and the ISA Report. Nowhere in the proposed plan are the results of the ISA discussed. Furthermore, I thought that no FS was done on these areas because the results of the RI indicated that there was no risk. If no ISA was done, then the Navy should delete this reference. If an ISA was performed, the results should be summarized in the Proposed Plan.

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SITES 05 and 08**

Response: *An ISA for Sites 05 and 08 was conducted in April 1993 with the results reported in the Draft Final Initial Screening of Alternatives (Group I, II, III, and VI) report. As discussed in the first paragraph of Section 6 (page 12) of the Draft Proposed Plan, the ISA Report was prepared on the basis of Phase I RI data only. The limited description of the ISA presented on page 12 is considered to be appropriate in terms of level of detail, since the review of the additional Phase II RI data provided the basis for the limited action decision. Providing more information on alternatives which were preliminarily identified in the ISA but never thoroughly evaluated because of the results of the Phase II RI would most likely provide a source of confusion with respect to public review. Therefore, no revisions to the Proposed Plan have been made. (Please note that the approach used in addressing this matter was discussed with Mike Daly, former EPA project manager, in a telephone conversation on February 23, 1994, prior to the submission of the Draft Proposed Plan).*

Page 4, Section 2.5

5. Is the Administrative Record not kept at the Information Repository? Does the Information Repository have more records than just the Admin. Record? If the Info. Repository contains the Administrative Record, then these references should be clarified to indicate that the Administrative Record is available at both places.

Response: *The Administrative Record is not kept at the Information Repository, but rather at the Naval Construction Battalion Center, as noted in the Proposed Plan. The Administrative Record, which is a legal file, contains more records than the Information Repository. The Glossary (on pages 14 and 15 of the Draft Proposed Plan) notes that the Administrative Record includes all information used by the Navy to make its decision on the selection of a response action under CERCLA while the Information Repository contains technical reports and reference documents regarding the NCBC Davisville sites. No revisions to the Proposed Plan have been incorporated on the basis of this comment.*

Page 5, Section 3.0, End of page

6. Add a few sentences that prepares the public for the next paragraph. A typical question the public might ask after reading this list would be, What alternatives were analyzed for these sites? Since we are proposing no action, you may want to state here that initial screening identifies any site that may be a potential problem but after further investigation

some of the sites may be identified as not posing a threat and others go on to alternative evaluation.

Response:     *The following sentences have been added to the referenced section of text:*

*In implementing the IR Program, an abbreviated approach may be suitable for those sites for which it is determined that remediation is not necessary. If the Navy determines on the basis of the identification and evaluation of the nature and extent of contamination at a site that the site poses no current or potential threats to human health or the environment, the Navy may determine that its authority under CERCLA Sections 104 or 106 to undertake a remedial action to ensure adequate protection need not be invoked. Under such circumstances, statutory cleanup standards of CERCLA are not triggered, and an evaluation of remedial alternatives is not required. Since the IR Program is an iterative process, an initial screening of potential remedial technologies may be conducted on the basis of initial site investigation information if that information indicates that the site may pose a potential threat but, if after additional investigation it is determined that the site does not pose a threat, a detailed evaluation of remedial alternatives may not be conducted.*

Page 6, Section 3.0

7.     The Navy should put "Initial Assessment Study" in bold and define it in the glossary. The same is true for "Confirmation Study."

Response:     *"Initial Assessment Study" has been highlighted with bold letters and defined within the glossary. "Confirmation Study" was previously presented in bold type at the point of its first use in Section 2.2 and is defined in the glossary.*

Page 6, Section 3.1, 3rd Paragraph

8.     The second sentence is confusing. The second sentence makes the area sound as if it was a small retention pond, why wouldn't natural gravity make it run off?

Response:     *The second sentence has been rewritten as follows: "Waste liquids from this recovery process were reportedly discharged during rainfall events onto the pavement outside of Building 314 and were allowed to drain from the pavement."*

9. The third sentence is also confusing. The third sentence makes it sound as if 15-20 gallons at a time were allowed to drain off the pavement. Please rework these sentences.

Response: *The third sentence has been relocated within the paragraph to minimize confusion.*

10. The sixth sentence needs additional clarification. A person unfamiliar with the IR process at NCBC may ask themselves why this site was not investigated until 1985 when Site 5 was investigated in 1984.

Response: *The Site 05 description (Section 3.1, paragraph 1) has been revised to indicate that the sample collected in 1984 was collected by Navy personnel and was not part of the Confirmation Study. The Site 08 description has not been revised.*

11. The last sentence is confusing as written, please change it to read: "While no existing public water supply wells are located within the vicinity of Site 08, there is a proposal to locate the North Kingstown Water Department Well north west of Site 08 as specified in the Phase I Report, Hunt River Aquifer Wellhead Recharge Area Study (GZA GeoEnvironmental, Inc.)."

Response: *The last sentence has been revised.*

Page 9, First complete sentence

12. This sentence as written may be confusing to lay persons. Aquifers are thought to be one big pool and it may be difficult for them to understand this concept. Please reword this.

Response: *The sentence has been revised as follows: "As indicated within the Wellhead Recharge Area Study, based on proposed pumping rates, the area from which the proposed well withdraws its water is not expected to extend to the area in which Site 08 is located."*

Page 9, Section 3.2

13. Add a sentence as to where the public may review these documents.

Response: *The following sentence has been added: "The public may review these documents at the Information Repository at the North Kingstown Free Library."*

Page 10, 2nd Paragraph, Last Sentence

14. Please add an explanation as to why the levels were different in the two sampling rounds.

Response: *It is assumed that this comment is directed to the first paragraph of page 10, not the 2nd paragraph, as noted. The following sentence has been added: "The detection of silver at varying levels during the two sampling rounds indicates that silver, a potential contaminant associated with the historic on-site silver recovery process, is not present at consistently high levels throughout the site soil."*

Page 10, Section 4.0, 1st paragraph

15. A statement should be provided regarding why a revised Human Health Risk Assessment (HHRA), which incorporated the data collected during the Phase II Remedial Investigation (RI), was conducted for Site 08, but not Site 05.

Response: *As indicated in Section 3.2, only a Phase I RI was conducted at Site 05, while both Phase I and II RIs were conducted at Site 08. It has been clarified in the first paragraph of Section 3.2 and in the first paragraph of Section 4.0 that a revised Human Health Risk Assessment was conducted only for Site 08.*

Page 10, Section 4.0, 3rd paragraph

16. Human health cancer risk is usually presented as  $10^{-4}$  to  $10^{-6}$  rather than  $1 \times 10^{-4}$  to  $1 \times 10^{-6}$ . Please make this change.

Response: *The text has been revised, as requested.*

17. NCP is the "National Oil and Hazardous Substances Pollution Contingency Plan." This change also needs to be made in the Glossary. Also, the Hazardous Index should be defined in the glossary, with an explanation of how it is derived.

Response: *The text has been revised, as requested.*

Page 11, 2nd Complete Paragraph

18. The presumption that Site 05 does not pose an ecological risk to communities in the Hall Creek Watershed is not yet conclusive. The comments on the Draft Ecological Risk Assessment (ERA) have not yet been fully addressed. Additionally, the draft ERA indicates that some potential risks due to pesticides may, in fact, exist to Hall Creek

Watershed. Therefore, the statement that Site 05 does not pose an ecological risk should be removed and replaced by a statement which correctly states what was presented in the ERA.

Response: *The text has been revised as follows: "The Navy has also evaluated potential ecological risks associated with the Hall Creek watershed, in which Site 05 and other developed areas of NCBC Davisville are located. Some potential for risk due to the presence of pesticides has been identified for the watershed. However, the potential for risk does not appear to be reflected in the functional value of the wetland. In addition, benthic and wildlife observations in Hall Creek watershed indicate a diverse and functioning ecosystem."*

Page 11, Section 4.0

19. The Navy notes that due to the lack of ground water data at Site 05, carcinogenic and non-carcinogenic risk were not determined. The Navy should explain what basis there is for a no action remedy if the Navy does not even know whether or not there is risk? This proposed plan should satisfactorily explain this rationale.

Response: *The last sentence of the first full paragraph of page 11 has been replaced with the following text: "As noted in Section 3.2, due to the low tendency for PCBs, the suspected contaminant at Site 05, to migrate to the ground water, no ground water investigations were conducted at Site 05. Therefore, potential risks associated with ground water ingestion were not evaluated for this site."*

20. In the discussion of Site 08, the Navy states that the non-carcinogenic risk from ground water is greater than unity. The Navy should state the actual number. Also, the Navy makes the statement that it is not necessary to clean the ground water because the site is expected not to be used for residential purposes. The Navy needs to discuss where the ground water flow goes, and whether any areas under the plume will be used for residential use. Alternatively, they need to state that the use restrictions will apply to all areas of the Site above the contaminated plume.

Response: *The non-carcinogenic risk from ground water at Site 08 has a Hazard Index (HI) of 3 under the future commercial/industrial site use scenario. This has been indicated in the sentence which follows the referenced sentence. In accordance with the proposed limited action for Site 08, a discussion of the ground water flow direction and the lack of potential downgradient receptors identified during the Phase II RI well search conducted within a one-mile radius of the site has been added to the section entitled "The Navy's Rationale for the Limited Action Decision".*



Page 12, Section 5

21. Reword the last sentence to read: "Because contaminants will remain at Sites 05 and 08, there will need to be limited use and restricted exposure. The Navy will review the No Action decision every five years after its initiation."

Response: *The text has been revised.*

Page 12, Section 6.0

22. The Navy needs to change the risk range description. See comment 18 above. Also, with regard to the discussion of the appropriateness of the No Action decision, the Navy should reference the sections of the NCP that permit no-action and outline the criteria for this type of decision.

Response: *The risk range has been revised, as requested. The following text revision has been incorporated into the introductory paragraph of Section 6.0: "Exposures resulting in a cancer risk within the range of one in ten thousand to one in a million ( $10^4$  to  $10^6$ ), as would occur under a restricted use scenario, are considered acceptable cancer risks as defined in the NCP. When the risk assessment provides the basis for concluding that the conditions at a site pose no current or potential threat to human health or the environment, the Navy may determine that its authority under CERCLA Sections 104 or 106 to undertake a remedial action to ensure adequate protection need not be invoked."*

Page 12, Last Paragraph

23. Background concentrations at the facility have not yet been established as indicated in comments on the draft RI for NCBC. The statement that arsenic levels in surface soils fall within the range of surface soil background should either be removed, or we need to reach agreement on the background samples and values.

Response: *The statement that arsenic levels in surface soils fall within the range of surface soil background levels is not affected by the deletion of background samples which contained PCBs or 1,1,1-trichloroethane. Therefore, the sentence has not been removed.*

Page 13, Section 6.0

24. In the discussion of Site 08, the Navy should revise the paragraph concerning EPA's authority to revisit the no action decision to discuss the role of five-year review, which is not

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discussed anywhere in the proposed plan. Since the Navy is leaving contaminants above health-based levels for unrestricted use, they will need to conduct five-year reviews. If the five-year reviews indicate that the remedy is not protective, then the Navy will have to re-evaluate the no-action remedy. The Navy should reference appropriate statutory and NCP sections regarding five-year and additional response actions that may result. These include CERCLA Section 120 (c) and 40 CFR 300.430 of the NCP.

Response:     *The paragraph has been revised as follows: "Since contaminants will remain on-site above health-based levels for future unrestricted site use, the Navy will be required to conduct five-year reviews of Site 05 and Site 08, as required under CERCLA Section 120 (c) and 40 CFR 300.430 of the NCP. If the five-year reviews indicate that the remedy is not protective, then the Navy will have to re-evaluate the limited action remedy and provide for additional response actions, if necessary."*

Page 13, Section 7.0

25.     Please add my name in this proposed plan as a source of information.

Response:     *This revision has been made, as requested.*

**Glossary**

26.     Federal Facilities Agreement should be Federal Facility Agreement.

Response:     *The text has been revised, as requested.*

27.     Maximum Contaminant Level is not well defined. There needs to be an explanation that MCLs are set under the SDWA and are the maximum allowable amounts of contaminants in sources of drinking water.

Response:     *The definition has been revised as requested.*

28.     NCP is the "National Oil and Hazardous Substances Pollution Contingency Plan."

Response:     *The text has been revised, as requested.*